Section III:

AMENDMENT UNDER 37 CFR §1.121 to the

DRAWINGS

No amendments or changes to the Drawings are proposed.

Section IV:

AMENDMENT UNDER 37 CFR §1.121

REMARKS

Change of Examiner, Rejection of Previously Allowed Claim

   In the first Office Action, dated December 16, 2004, Claim 3 was indicated as allowable by examiner Ramya Ananthanarayanan. In response to this indication, applicant amended the steps, elements or limitations of Claim 3 into the independent claims of the application, and amended claim 3 to cover a different aspect of the invention.

   Subsequently, examiner Kaveh Abrishamkar took up the examination, and withdrew the allowability without explanation. Applicants objected to this change in position upon the reasons that the issuance of new rejections over newly cited art under 35 U.S.C. §102, therefore, may constitute improperly taking an entirely new approach, improperly attempting to reorient the point of view of a previous examiner, and/or improperly making a new search in the mere hope of finding something. *Amgen, Inv. V. Hoechst Marion Roussel, Inc.,* 126 F. Supp. 2d 69, 139, 57 USPQ2d 1449, 1499 - 50 (D. Mass. 2001), as cited in MPEP 706.04.

   In the present Office Action, no response or explanation regarding why the allowance of Claim 3 was withdrawn, and no response to Applicants' objection to this change in position was provided. Applicant reserves the right to petition or Appeal this basis. Applicants' reply contained herein addressing the substance of the newly cited art should not be construed as a waiver of a right to Appeal or Petition on this basis.

Request for Telephone Interview

   Applicants request a telephone interview with the examiner following receipt of the present reply in order to answer any questions the examiner may have, and to consider any suggestions the examiner may offer. Applicants' agent, Robert H. Frantz, can be reached at 405-812-5613, by the examiner to indicate the examiner's choice of time and date for the telephone interview.

Rejections under 35 U.S.C. §102(e)

Rejections of Claims 1 - 24 Over Trabelsi

In the Office Action dated May 4, 2005, claims 1 - 24 were rejected under 35 U.S.C. §102(e) for lack of novelty as being anticipated by U.S. Published Patent Application US2001/0056494 to Trabelsi (hereinafter "Trabelsi"). Claims 1, 4, 9, 12, 17 and 20 are independent claims.

As specified in Claim 3 as originally filed, and as indicated as allowable in a previous Office Action, a step, element or limitation of our invention which allows _reuse_ of a finite number "action indicators" in association with a plurality of "action group tags" or "action group containers", wherein each action indicator combined with the group tag or container can be assigned a unique permission, was previously amended into the independent claims 1, 4, 9, 12, 17 and 20. In this manner, the number of permissions which can be controlled is expanded to beyond just the number of action indicators, but to an upper limit equal to the product of the number of allowable action indicators and the number of action tags or action containers.

Consistent with our disclosure, by "action indicators", we mean the permission indicators for actions such as "attach", "add", "connect", "delete", etc., as discussed in paragraphs [0065] - [0066], Table 3, and paragraph [0071]. These are indicating allowable actions, not _users_. A user's identity or identifier is contained elsewhere in the access control list, but is not the same as the action indicators.

By "action group container" and "action group tags", we mean a group of action indicators, not a group of users. Action indicators which are all related to each other for some common reason or purpose, such as performing a system backup, can be grouped under a single action group tag, or contained in an action group container. These are not tags for groups of users, or containers for groups of users, as discussed in our paragraphs [0070] - [0078].

To extend the ability of defining permitted actions within the groups of actions, we have disclosed and claimed the ability to "re-use" action indicators between multiple groups. For example, in systems without our invention, an action indicator of "r" might always permit a "read" action. But, with use of our invention, the action indicator "r" might permit a "read" action in an action group called "file_check_out", but the same action "r" might permit a "rewind" operation in an action group called "tape_operations", as discussed in our paragraphs

[0070] - [0073].

As such, even with a fairly limited number of distinct action indicators, such as the 18 pre-defined action indicators of the embodiment which operates in cooperation with Tivoli's Policy Director, many more actions than 18 can be controlled based upon redefining each action indicator's meaning within multiple action group tags or multiple action group containers.

Trabelsi's Generic Groups of Permissions with Filters

Trabelsi is silent as teaching our action group containers and our reusable action indicators. Trabelsi's "generic groups" of permissions are not containers of permissions, and Trabelsi's "filters" are not reusable action indicators, as we have defined them and described them.

Trabelsi has disclosed that rights indicators or the resources themselves can be grouped into "generic groups" using "filters", where the filters can be a special character such as "*" or keywords such as "any" (emphasis added by Applicants):

. . .

[0043] The rights or the resources can be grouped into **generic groups** represented by **filters** in the form of **special characters** such as a star "*"or by **keywords** such as the word "any". The keyword "any" indicates, for example, any privilege. The table of FIG. 4 indicates exemplary meanings of the star filter. The "star" filter applied to a right with the format "xyz*" means any right whose name begins with xyz. The "star" filter applied to a resource type with the format "mytype*" means any resource whose type is mytype. The "star" filter applied to a resource path "/abc/def/*" means any resource whose path is a subpath of /abc/def/.

[0044] **The filters and keywords make it possible to combine a large number of entries into one, and in this way to facilitate the management of the configuration.**

. . .

Trabelsi's "filters" are functioning as wildcard characters according to this description. These filters act as wildcard operators in lists of permissions so that the traditional, single-meaning rights indicators can be easily incorporated into a larger group without actually

specifying the indicator itself.

Consider Trabelsi's example group right called "xyz*". Trabelsi explains that this would include any right whose name begins with "xyz". So, for example, Applicants believe that this means the distinctively different rights "xyzopen" and "xyzdelete" in Trabelsi's way of naming rights (unlike our rights indicators which are individual characters), could be easily assigned to a user by giving that user a permission of "xyz*". This, however, does not mean the that filtered portions of the rights names, specifically "open" and "delete" in this example, could be re-used for some other meaning, as we have claimed. For example, wouldn't "abcopen" and "abcclose" would represent analogous rights to the resource "abc" compared to the rights "xyzopen" and "xyzclose" for the resource "xyz"? So, this same open+delete rights "group" could be specified by Trabelsi's invention as "abc*".

While this is useful, it is not the same as our claimed re-usable rights indicators, where a character, such as "k", can be used to indicate a right, such as "open", when it appears in a first rights container, but "k" can be re-used to indicate a different right, such as "delete", when it is used in a different rights container. Trabelsi's generic groups are not the same as containers of permissions, either.

To further corroborate our interpretation of Trabelsi's meaning of "filter" as a wildcard, note the French original disclosure available in Trabelsi's public PAIR Image File Wrapper. Especially note that the paragraphs corresponding to English translation paragraphs[0042] and [0043] utilize the French word "filtre" in place of the English word "filter":

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Les droits ou les ressources sont susceptibles d'être regroupés en groupes génériques représentés par des filtres sous forme de caractères spéciaux tels qu'une étoile « * » ou par des mots-clés tels que le mot « any ». Le mot-clé « any » signifie par exemple tout privilège. Le tableau de la figure

5   4 indiquent des exemples de signification du filtre étoile *. Le filtre « étoile » appliqué à un droit de format « xyz* » signifie tout droit dont le nom commence par xyz. Le filtre « étoile « appliqué à un type de ressource de format « mytype* » signifie toute ressource dont le type est mytype. Le filtre « étoile » appliqué à un chemin de ressource « /abc/def/* » signifie toute

10   ressource dont le chemin est un sous-ensemble de /abc/def/.

Les filtres et mot-clés permettent de regrouper un grand nombre d'entrées en une seule et de faciliter de ce fait l'administration de la configuration.

Trabelsi's Original Disclosure in French, Pg. 9, lines 1 - 13

According to a French-to-English information technology dictionary "Glossaire informatique des termes de la Commission ministérielle de terminologie informatique" (Glossary of Information Technology Terms from the Ministerial Commission for Terminology of Information Technology), available at http://www-rocq.inria.fr/qui/Philippe.Deschamp /CMTI/glossaire.html#F, we find that "filtrage", which is the literal of English "filtering", is defined as:

Filtrage, n. m.
> Voir : appariement de formes.

which refers the reader to the definition:

Appariement de formes, n. m.

      Mise en correspondance de formes selon un ensemble prédéfini de règles ou de critères.

      Synonyme : filtrage, n. m.

      Anglais : pattern matching.

The English translation (Anglais) for French "filtre" is "pattern match". Pattern matching is synonymous with the function of wildcard characters such as "*" (e.g. anything starting with "abc" is found by pattern matching specification "abc*"). This, of course, is not referring to reusable characters in containers of characters, but instead is forming a super-group of permissions whose name or description match a pattern specification.

For these reasons, to interpret Trabelsi as disclosing our "action groups", "action containers", and our "reusable indicators" in the manner proposed in the rationale for the rejections would be improper importation of our definitions into the cited art. Applicants, therefore, request allowance of independent claims 1 - 24.

Respectfully,

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